

May 11, 1999

Dockets Management Branch (HFA-305) 0285 '99 MAY 14 P2:40
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

Re: Docket # 98N-1038, "Irradiation in the Production,
Processing, and Handling of Food"

To Whom It May Concern:

I am a parent and youth advocate, active in my community on public school and youth issues.

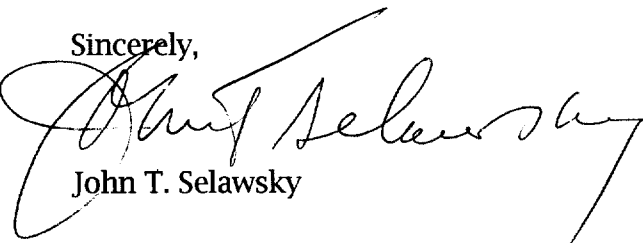
The FDA should retain the current labeling law, the current terminology of "treated with radiation" or "treated by irradiation," and the use of the radura symbol on all irradiated whole foods.

Regarding the issue of labeling, in its initial petition, the FDA concluded that irradiation was a "material fact" about the processing of a food, and thus should be disclosed. The material fact remains; therefore, labeling should remain. Consumer acceptability, storage qualities and nutrients are affected. Some irradiated foods have different texture and spoilage characteristics than untreated foods. Most fruits and vegetables have nutrient losses that are not obvious or expected by the consumer. In planning their diet, consumers should be able to take into account nutritional differences between irradiated and nonirradiated foods.

The irradiation disclosure on the label should be large enough to be readily visible to the consumer, on the front of the package. The label contains important information regarding the processing of the contents. For displayed whole foods such as produce, a prominent informational display similar to that used for meats should be used (but containing the term "irradiation" and the radura). Any term involving "pasteurization" is misleading. Pasteurization is a completely different process that I associate with milk products.

Because of the newness of the technology and the need to assess the public health effects of widespread use of irradiated foods, I believe that the FDA's labeling requirement should not be permitted to expire.

Sincerely,



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